

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P., et al.*

Case No. 18-op-45090

THE COUNTY OF SUMMIT, OHIO;
SUMMIT COUNTY PUBLIC HEALTH; THE
CITY OF AKRON; THE CITY OF
BARBERTON; THE VILLAGE OF BOSTON
HEIGHTS; BOSTON TOWNSHIP; THE
VILLAGE OF CLINTON; COPLEY
TOWNSHIP; COVENTRY TOWNSHIP; THE
CITY OF CUYAHOGA FALLS; THE CITY
OF FAIRLAWN; THE CITY OF GREEN; THE
VILLAGE OF LAKEMORE; THE VILLAGE
OF MOGADORE; THE CITY OF MUNROE
FALLS; THE CITY OF NEW FRANKLIN;
THE CITY OF NORTON; THE VILLAGE OF
PENINSULA; THE VILLAGE OF
RICHFIELD; THE VILLAGE OF SILVER
LAKE; SPRINGFIELD TOWNSHIP; THE
CITY OF STOW; THE CITY OF
TALLMADGE; VALLEY FIRE DISTRICT;
STATE OF OHIO EX REL., PROSECUTING
ATTORNEY FOR SUMMIT COUNTY,
SHERRI BEVAN WALSH, THE DIRECTOR
OF LAW FOR THE CITY OF AKRON, EVE
BELFANCE, THE DIRECTOR OF LAW FOR
THE CITY OF BARBERTON, LISA MILLER,
THE DIRECTOR OF LAW FOR THE CITY
OF TALLMADGE, MEGAN RABER; THE
LAW DIRECTOR FOR THE CITY OF
CUYAHOGA FALLS, RUSS BALTHIS, THE
LAW DIRECTOR FOR THE CITY OF
FAIRLAWN, BRYAN NACE, THE LAW
DIRECTOR FOR THE CITY OF GREEN,
INTERIM LAW DIRECTOR BILL CHRIS,

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

DEFENDANT NORAMCO, INC.'S
ANSWER TO CORRECTED SECOND
AMENDED COMPLAINT,
AFFIRMATIVE DEFENSES, AND
JURY DEMAND

THE LAW DIRECTOR FOR THE CITY OF MOGADORE, MARSHAL M. PITCHFORD, THE LAW DIRECTOR FOR THE CITY OF MUNROE FALLS, TOM KOSTOFF, THE LAW DIRECTOR FOR THE CITY OF NEW FRANKLIN, THOMAS MUSARRA, THE LAW DIRECTOR FOR THE CITY OF NORTON, JUSTIN MARKEY; THE LAW DIRECTOR FOR THE CITY OF STOW, AMBER ZIBRITOSKY; THE VILLAGE SOLICITOR FOR THE VILLAGE OF BOSTON HEIGHTS, MARSHAL PITCHFORD), THE SOLICITOR FOR BOSTON TOWNSHIP, ED PULLEKINS), SOLICITOR FOR THE VILLAGE OF CLINTON, MARSHAL PITCHFORD, THE LAW SOLICITOR FOR COPLEY TOWNSHIP, IRV SUGARMAN, THE LAW SOLICITOR FOR COVENTRY TOWNSHIP, IRV SUGARMAN, THE LAW SOLICITOR FOR THE VILLAGE OF LAKEMORE, IRV SUGARMAN, THE SOLICITOR FOR THE VILLAGE OF PENINSULA, BRAD BRYAN, THE LAW SOLICITOR FOR THE VILLAGE OF RICHFIELD, WILLIAM HANNA, THE SOLICITOR THE VILLAGE OF SILVER LAKE, BOB HEYDORN, AND THE ADMINISTRATOR & LEGAL COUNSEL FOR SPRINGFIELD TOWNSHIP, WARREN PRICE,

Plaintiffs,

vs.

PURDUE PHARMA, L.P.; PURDUE PHARMA, INC.; THE PURDUE FREDERICK COMPANY, INC.; ENDO HEALTH SOLUTIONS INC.; ENDO PHARMACEUTICALS, INC.; PAR PHARMACEUTICAL, INC.; PAR PHARMACEUTICAL COMPANIES, INC. F/K/A PAR PHARMACEUTICAL HOLDINGS, INC.; JANSSEN

PHARMACEUTICALS, INC.; ORTHO-MCNEIL-JANSSEN PHARMACEUTICALS, INC. N/K/A JANSSEN PHARMACEUTICALS, INC.; / JANSSEN PHARMACEUTICA, INC. N/K/A JANSSEN PHARMACEUTICALS, INC.; JOHNSON & JOHNSON; NORAMCO, INC.; TEVA PHARMACEUTICAL INDUSTRIES, LTD.; TEVA PHARMACEUTICALS USA, INC.; CEPHALON, INC.; ALLERGAN PLC F/K/A ACTAVIS PLC; ALLERGAN FINANCE LLC, F/K/A/ ACTAVIS, INC., F/K/A WATSON PHARMACEUTICALS, INC.; WATSON LABORATORIES, INC.; ACTAVIS LLC; ACTAVIS PHARMA, INC. F/K/A WATSON PHARMA, INC; INSYS THERAPEUTICS, INC., MALLINCKRODT PLC; MALLINCKRODT LLC; SPECGX LLC, AMERISOURCEBERGEN DRUG CORPORATION; ANDA, INC.; CARDINAL HEALTH, INC.; CVS HEALTH CORPORATION; DISCOUNT DRUG MART, INC.; HBC SERVICE COMPANY; HENRY SCHEIN, INC.; HENRY SCHEIN MEDICAL SYSTEMS, INC.; MCKESSON CORPORATION; MIAMI-LUKEN, INC.; PRESCRIPTION SUPPLY, INC.; RITE AID CORPORATION.; RITE AID OF MARYLAND, INC.; D/B/A RITE-AID MID-ATLANTIC CUSTOMER SUPPORT CENTER, INC; WALGREENS BOOTS ALLIANCE, INC. A/K/A WALGREEN CO., AND WALMART INC. F/K/A WAL-MART STORES, INC.,

Defendants.

DEFENDANT NORMACO, INC.'S ANSWER TO CORRECTED SECOND AMENDED COMPLAINT, AFFIRMATIVE DEFENSES, AND JURY DEMAND

Defendant Noramco, Inc. (“Noramco”) hereby files its Answer, Affirmative Defenses, and Jury Demand in response to Plaintiffs’ Corrected Second Amended Complaint and Jury Demand (the “Complaint”) in the above-referenced action and, in support, respectfully states as follows:

RESPONSES TO ALLEGATIONS IN NUMBERED PARAGRAPHS

Answering the numbered Paragraphs of the Complaint, Noramco states as follows:

1. Noramco admits that the Plaintiffs listed in the Complaint bring this action against the Defendants listed in the Complaint. Noramco specifically denies, however, that it is a proper defendant in this action. Noramco, a company referenced in the Complaint as a former subsidiary of Johnson & Johnson, does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation. Noramco also specifically denies that it engaged in any wrongful acts or omissions alleged in the Complaint or otherwise relating to this action. Finally, Noramco specifically denies that Plaintiffs are entitled to any relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1.

2. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 and can neither admit nor deny the same.

3. Denied.

4. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 and can neither admit nor deny the same.

5. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 and can neither admit nor deny the same.

6. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 and can neither admit nor deny the same.

7. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7 and can neither admit nor deny the same.

8. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 and can neither admit nor deny the same.

9. Noramco specifically denies that it is a proper defendant in this action and that it in any way contributed to the opioid crisis. Noramco does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation. Noramco also specifically denies that it engaged in any wrongful acts or omissions alleged in the Complaint or otherwise relating to this action. Finally, Noramco specifically denies that Plaintiffs are entitled to any relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 9.

10. Denied.

11. Denied.

12. Noramco denies the allegations in the first and second sentences of Paragraph 12. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 12 and can neither admit nor deny the same.

13. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 and can neither admit nor deny the same.

14. Denied.

15. Denied.

16. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 and can neither admit nor deny the same.

17. Answering the first two sentences of Paragraph 17, in which Plaintiffs allege, “As millions became addicted to opioids, ‘pill mills,’ often styled as ‘pain clinics,’ sprouted nationwide and rogue prescribers stepped in to supply prescriptions for non-medical use. These pill mills, typically under the auspices of licensed medical professionals, issue high volumes of opioid prescriptions under the guise of medical treatment,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 17.

18. Denied.

19. Answering the second sentence of Paragraph 19, in which Plaintiffs allege, “As the then CDC director concluded: ‘We know of no other medication routinely used for a nonfatal condition that kills patients so frequently,’” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 19.

20. Denied.

21. Denied.

22. Noramco specifically denies that it has engaged in any misconduct. Except as thus stated, denied.

23. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23 and can neither admit nor deny the same.

24. Noramco admits that the Plaintiffs listed in the Complaint bring this action against the Defendants listed in the Complaint. Noramco specifically denies, however, that it is a proper defendant in this action. Noramco does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation. Noramco also specifically denies that it engaged in any wrongful acts or omissions alleged in the Complaint or otherwise relating to this action. Finally, Noramco specifically denies that Plaintiffs are entitled to any relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 24.

25. Paragraph 25 asserts legal conclusions regarding jurisdiction to which no response is required. To the extent a response is required, Noramco specifically denies that the Court has jurisdiction over any claims asserted against Noramco.

26. Paragraph 26 asserts legal conclusions regarding jurisdiction to which no response is required. To the extent a response is required, Noramco denies that it committed any act or omission that would subject it to the jurisdiction of the Court, and therefore denies the allegations in Paragraph 26. Noramco specifically denies that personal jurisdiction over it would be consistent with the due process requirements of the United States Constitution.

27. Paragraph 27 asserts legal conclusions regarding venue to which no response is required. To the extent a response is required, Noramco denies that it committed any act or omission that would subject it to the venue of the Court, and therefore denies the allegations in Paragraph 27.

28. Noramco admits only that the Plaintiff listed in Paragraph 28 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is

entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 28 and can neither admit nor deny the same.

29. Noramco admits only that the Plaintiff listed in Paragraph 29 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 29 and can neither admit nor deny the same.

30. Noramco admits only that the Plaintiff listed in Paragraph 30 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 30 and can neither admit nor deny the same.

31. Noramco admits only that the Plaintiff listed in Paragraph 31 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 31 and can neither admit nor deny the same.

32. Noramco admits only that the Plaintiff listed in Paragraph 32 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or

information sufficient to form a belief as to the truth allegations in Paragraph 32 and can neither admit nor deny the same.

33. Noramco admits only that the Plaintiff listed in Paragraph 33 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 33 and can neither admit nor deny the same.

34. Noramco admits only that the Plaintiff listed in Paragraph 34 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 34 and can neither admit nor deny the same.

35. Noramco admits only that the Plaintiff listed in Paragraph 35 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 35 and can neither admit nor deny the same.

36. Noramco admits only that the Plaintiff listed in Paragraph 36 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 36 and can neither admit nor deny the same.

37. Noramco admits only that the Plaintiff listed in Paragraph 37 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 37 and can neither admit nor deny the same.

38. Noramco admits only that the Plaintiff listed in Paragraph 38 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 38 and can neither admit nor deny the same.

39. Noramco admits only that the Plaintiff listed in Paragraph 39 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 39 and can neither admit nor deny the same.

40. Noramco admits only that the Plaintiff listed in Paragraph 40 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 40 and can neither admit nor deny the same.

41. Noramco admits only that the Plaintiff listed in Paragraph 41 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is

entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 41 and can neither admit nor deny the same.

42. Noramco admits only that the Plaintiff listed in Paragraph 42 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 42 and can neither admit nor deny the same.

43. Noramco admits only that the Plaintiff listed in Paragraph 43 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 43 and can neither admit nor deny the same.

44. Noramco admits only that the Plaintiff listed in Paragraph 44 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 44 and can neither admit nor deny the same.

45. Noramco admits only that the Plaintiff listed in Paragraph 45 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or

information sufficient to form a belief as to the truth allegations in Paragraph 45 and can neither admit nor deny the same.

46. Noramco admits only that the Plaintiff listed in Paragraph 46 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 46 and can neither admit nor deny the same.

47. Noramco admits only that the Plaintiff listed in Paragraph 47 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 47 and can neither admit nor deny the same.

48. Noramco admits only that the Plaintiff listed in Paragraph 48 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 48 and can neither admit nor deny the same.

49. Noramco admits only that the Plaintiff listed in Paragraph 49 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 49 and can neither admit nor deny the same.

50. Noramco admits only that the Plaintiff listed in Paragraph 50 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 50 and can neither admit nor deny the same.

51. Noramco admits only that the Plaintiff listed in Paragraph 51 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 51 and can neither admit nor deny the same.

52. Noramco admits only that the Plaintiff listed in Paragraph 52 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 52 and can neither admit nor deny the same.

53. Noramco admits only that the Plaintiff listed in Paragraph 53 purports to bring this action in the manner alleged. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth allegations in Paragraph 53 and can neither admit nor deny the same.

54. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54 and can neither admit nor deny the same.

55. Noramco admits that the Plaintiffs listed in Paragraph 55 refer to themselves collectively in the Complaint as “Plaintiffs.” Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 55.

56. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56 and can neither admit nor deny the same.

57. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57 and can neither admit nor deny the same.

58. Denied.

59. Denied.

60. Noramco admits only that Plaintiffs purport to seek the relief alleged in the complaint. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 60.

61. The allegations in Paragraph 61 call for a legal conclusion to which no response is required.

62. The allegations in Paragraph 62 call for a legal conclusion to which no response is required.

63. Denied.

64. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64 and can neither admit nor deny the same.

65. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65 and can neither admit nor deny the same.

66. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66 and can neither admit nor deny the same.

67. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67 and can neither admit nor deny the same.

68. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68 and can neither admit nor deny the same.

69. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69 and can neither admit nor deny the same.

70. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70 and can neither admit nor deny the same.

71. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71 and can neither admit nor deny the same.

72. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72 and can neither admit nor deny the same.

73. Omitted from the Complaint.

74. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74 and can neither admit nor deny the same.

75. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75 and can neither admit nor deny the same.

76. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76 and can neither admit nor deny the same.

77. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77 and can neither admit nor deny the same.

78. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78 and can neither admit nor deny the same.

79. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79 and can neither admit nor deny the same.

80. Noramco admits only that its headquarters is located in Wilmington, Delaware, that it was a wholly-owned subsidiary of Johnson & Johnson until July 1, 2016, that it was acquired by SK Capital in July 2016, and that it only manufactures active pharmaceutical ingredients. Except as thus stated, Noramco denies the allegations in Paragraph 80.

81. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81 and can neither admit nor deny the same.

82. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82 and can neither admit nor deny the same.

83. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83 and can neither admit nor deny the same.

84. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84 and can neither admit nor deny the same.

85. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85 and can neither admit nor deny the same.

86. Noramco admits only that Johnson & Johnson had a code of conduct during the time that Noramco was a wholly-owned subsidiary of Johnson & Johnson. Except as thus stated,

Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86 and can neither admit nor deny the same.

87. Noramco admits only that Johnson & Johnson had a code of conduct during the time that Noramco was a wholly-owned subsidiary of Johnson & Johnson. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87 and can neither admit nor deny the same.

88. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88 and can neither admit nor deny the same.

89. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89 and can neither admit nor deny the same.

90. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90 and can neither admit nor deny the same.

91. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91 and can neither admit nor deny the same.

92. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92 and can neither admit nor deny the same.

93. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93 and can neither admit nor deny the same.

94. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94 and can neither admit nor deny the same.

95. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 95 and can neither admit nor deny the same.

96. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 96 and can neither admit nor deny the same.

97. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 97 and can neither admit nor deny the same.

98. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98 and can neither admit nor deny the same.

99. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99 and can neither admit nor deny the same.

100. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100 and can neither admit nor deny the same.

101. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101 and can neither admit nor deny the same.

102. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102 and can neither admit nor deny the same.

103. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 103 and can neither admit nor deny the same.

104. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 104 and can neither admit nor deny the same.

105. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105 and can neither admit nor deny the same.

106. Noramco admits only that Plaintiffs refer to the entities listed in Paragraph 106 as “Marketing Defendants” and “RICO Marketing Defendants” as specified in that Paragraph.

Noramco does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 106.

107. The allegations in Paragraph 107 are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent a response is required, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107 and can neither admit nor deny the same.

108. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108 and can neither admit nor deny the same.

109. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 and can neither admit nor deny the same.

110. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 110 and can neither admit nor deny the same.

111. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 111 and can neither admit nor deny the same.

112. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112 and can neither admit nor deny the same.

113. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113 and can neither admit nor deny the same.

114. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114 and can neither admit nor deny the same.

115. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115 and can neither admit nor deny the same.

116. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116 and can neither admit nor deny the same.

117. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117 and can neither admit nor deny the same.

118. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118 and can neither admit nor deny the same.

119. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119 and can neither admit nor deny the same.

120. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120 and can neither admit nor deny the same.

121. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121 and can neither admit nor deny the same.

122. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122 and can neither admit nor deny the same.

123. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123 and can neither admit nor deny the same.

124. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124 and can neither admit nor deny the same.

125. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125 and can neither admit nor deny the same.

126. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126 and can neither admit nor deny the same.

127. The allegations in Paragraph 127 are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent a response is required, Noramco admits only that Plaintiffs refer to the entities listed in Paragraph 127 as “National Retail Pharmacies,” Distributor Defendants,” and “RICO Supply Chain Defendants” as specified in that Paragraph. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 127.

128. Noramco admits only that Plaintiffs refer to the entities listed in the Complaint in accordance with the various collective names identified in the Complaint. Noramco specifically denies that any Plaintiff in this action is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 128.

129. Denied.

130. Noramco admits only that opioids, when FDA approved, are used to treat pain and that opioids are derived from the poppy. Except as thus stated, Noramco denies the allegations in Paragraph 130.

131. Noramco admits only the allegations in the second sentence of Paragraph 131, in which Plaintiffs allege: “The opium poppy contains various opium alkaloids, three of which are used in the pharmaceutical industry today: morphine, codeine, and thebaine.” Noramco denies the allegations in first sentence of Paragraph 131. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131 and can neither admit nor deny the same.

132. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132 and can neither admit nor deny the same.

133. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 133 and can neither admit nor deny the same.

134. Denied.

135. Noramco admits only that opioids are regulated as Schedule II controlled substances. Except as thus stated, Noramco denies the allegations in Paragraph 135.

136. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136 and can neither admit nor deny the same.

137. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137 and can neither admit nor deny the same.

138. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138 and can neither admit nor deny the same.

139. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 139 and can neither admit nor deny the same.

140. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140 and can neither admit nor deny the same.

141. Noramco admits only that fentanyl is a synthetic opioid. Except as thus stated, Noramco denies the allegations in Paragraph 141.

142. Noramco admits only that different types of opioids act differently depending on their specific properties and presentations as short-acting or long-acting formulations. Except as thus stated, Noramco denies the allegations in Paragraph 142.

143. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 143 and can neither admit nor deny the same.

144. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 144 and can neither admit nor deny the same.

145. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 145 and can neither admit nor deny the same.

146. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 146 and can neither admit nor deny the same.

147. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 147 and can neither admit nor deny the same.

148. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 148 and can neither admit nor deny the same.

149. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 149 and can neither admit nor deny the same.

150. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 150 and can neither admit nor deny the same.

151. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 151 and can neither admit nor deny the same.

152. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152 and can neither admit nor deny the same.

153. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153 and can neither admit nor deny the same.

154. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154 and can neither admit nor deny the same.

155. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155 and can neither admit nor deny the same.

156. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156 and can neither admit nor deny the same.

157. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157 and can neither admit nor deny the same.

158. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 158 and can neither admit nor deny the same.

159. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159 and can neither admit nor deny the same.

160. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160 and can neither admit nor deny the same.

161. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161 and can neither admit nor deny the same.

162. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162 and can neither admit nor deny the same.

163. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163 and can neither admit nor deny the same.

164. Denied.

165. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165 and can neither admit nor deny the same.

166. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166 and can neither admit nor deny the same.

167. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167 and can neither admit nor deny the same.

168. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168 and can neither admit nor deny the same.

169. Noramco admits only that the drug marketed as Nucynta was made of an opioid-like synthetic active ingredient called Tapentadol HCl. Except as thus stated, denied.

170. Noramco denies the allegations in the first sentence of Paragraph 170, in which Plaintiffs allege: “By adding additional opioids or expanding the use of their existing opioid products, the other Marketing Defendants took advantage of the market created by Purdue’s aggressive promotion of OxyContin and reaped enormous profits.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170 and can neither admit nor deny the same.

171. Denied.

172. Denied.

173. The allegations in Paragraph 173 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco denies the allegations in Paragraph 173.

174. Denied.

175. Denied.

176. Denied.

177. Denied, including all subparagraphs.

178. Denied.

179. Denied. In further response to Paragraph 179, Noramco states that it does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation.

180. Denied.

181. Denied.

182. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182 and can neither admit nor deny the same.

183. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183 and can neither admit nor deny the same.

184. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184 and can neither admit nor deny the same.

185. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185 and can neither admit nor deny the same.

186. Noramco denies that it ever referenced the Porter & Jick letter. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186 and can neither admit nor deny the same.

187. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187 and can neither admit nor deny the same.

188. Denied.

189. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189 and can neither admit nor deny the same.

190. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190 and can neither admit nor deny the same.

191. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191 and can neither admit nor deny the same.

192. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192 and can neither admit nor deny the same.

193. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193 and can neither admit nor deny the same.

194. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194 and can neither admit nor deny the same.

195. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195 and can neither admit nor deny the same.

196. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 196 and can neither admit nor deny the same.

197. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197 and can neither admit nor deny the same.

198. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198 and can neither admit nor deny the same.

199. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199 and can neither admit nor deny the same.

200. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200 and can neither admit nor deny the same.

201. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 201 and can neither admit nor deny the same.

202. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202 and can neither admit nor deny the same.

203. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203 and can neither admit nor deny the same.

204. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204 and can neither admit nor deny the same.

205. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205 and can neither admit nor deny the same.

206. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 206 and can neither admit nor deny the same.

207. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207 and can neither admit nor deny the same.

208. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 208 and can neither admit nor deny the same.

209. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 209 and can neither admit nor deny the same.

210. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210 and can neither admit nor deny the same.

211. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 211 and can neither admit nor deny the same.

212. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212 and can neither admit nor deny the same.

213. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213 and can neither admit nor deny the same.

214. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214 and can neither admit nor deny the same.

215. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 215 and can neither admit nor deny the same.

216. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216 and can neither admit nor deny the same.

217. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 217 and can neither admit nor deny the same.

218. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218 and can neither admit nor deny the same.

219. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219 and can neither admit nor deny the same.

220. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220 and can neither admit nor deny the same.

221. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 221 and can neither admit nor deny the same.

222. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222 and can neither admit nor deny the same.

223. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223 and can neither admit nor deny the same.

224. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 224 and can neither admit nor deny the same.

225. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 225 and can neither admit nor deny the same.

226. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226 and can neither admit nor deny the same.

227. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 227 and can neither admit nor deny the same.

228. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228 and can neither admit nor deny the same.

229. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229 and can neither admit nor deny the same.

230. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230 and can neither admit nor deny the same.

231. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231 and can neither admit nor deny the same.

232. Denied.

233. Denied.

234. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234 and can neither admit nor deny the same.

235. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235 and can neither admit nor deny the same.

236. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236 and can neither admit nor deny the same.

237. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 237 and can neither admit nor deny the same.

238. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238 and can neither admit nor deny the same.

239. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239 and can neither admit nor deny the same.

240. Denied.

241. Noramco denies the allegations in the first sentence of Paragraph 241. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241 and can neither admit nor deny the same.

242. Denied.

243. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243 and can neither admit nor deny the same.

244. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244 and can neither admit nor deny the same.

245. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245 and can neither admit nor deny the same.

246. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246 and can neither admit nor deny the same.

247. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 247 and can neither admit nor deny the same.

248. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 248 and can neither admit nor deny the same.

249. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249 and can neither admit nor deny the same.

250. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250 and can neither admit nor deny the same.

251. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 251 and can neither admit nor deny the same.

252. Denied.

253. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 253 and can neither admit nor deny the same.

254. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254 and can neither admit nor deny the same.

255. Denied.

256. Denied.

257. Noramco denies the allegations in the first sentence of Paragraph 257. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257 and can neither admit nor deny the same.

258. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258 and can neither admit nor deny the same.

259. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 259 and can neither admit nor deny the same.

260. Noramco denies the allegations in the first sentence of Paragraph 260. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260 and can neither admit nor deny the same.

261. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 261 and can neither admit nor deny the same.

262. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 262 and can neither admit nor deny the same.

263. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 263 and can neither admit nor deny the same.

264. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264 and can neither admit nor deny the same.

265. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265 and can neither admit nor deny the same.

266. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266 and can neither admit nor deny the same.

267. Noramco denies the allegations in the first sentence of Paragraph 267. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267 and can neither admit nor deny the same.

268. Denied.

269. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269 and can neither admit nor deny the same.

270. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270 and can neither admit nor deny the same.

271. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 271 and can neither admit nor deny the same.

272. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272 and can neither admit nor deny the same.

273. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273 and can neither admit nor deny the same.

274. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274 and can neither admit nor deny the same.

275. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275 and can neither admit nor deny the same.

276. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276 and can neither admit nor deny the same.

277. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277 and can neither admit nor deny the same.

278. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278 and can neither admit nor deny the same.

279. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279 and can neither admit nor deny the same.

280. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280 and can neither admit nor deny the same.

281. Noramco denies the allegations in the first and third sentences of Paragraph 281. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281 and can neither admit nor deny the same.

282. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282 and can neither admit nor deny the same.

283. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283 and can neither admit nor deny the same.

284. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284 and can neither admit nor deny the same.

285. Denied.

286. Denied.

287. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287 and can neither admit nor deny the same.

288. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288 and can neither admit nor deny the same.

289. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289 and can neither admit nor deny the same.

290. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 290 and can neither admit nor deny the same.

291. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 291 and can neither admit nor deny the same.

292. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292 and can neither admit nor deny the same.

293. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 293 and can neither admit nor deny the same.

294. Noramco denies the allegations in the first sentence of Paragraph 294. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294 and can neither admit nor deny the same.

295. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 295 and can neither admit nor deny the same.

296. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296 and can neither admit nor deny the same.

297. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297 and can neither admit nor deny the same.

298. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298 and can neither admit nor deny the same.

299. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 299 and can neither admit nor deny the same.

300. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300 and can neither admit nor deny the same.

301. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301 and can neither admit nor deny the same.

302. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 302 and can neither admit nor deny the same.

303. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 303 and can neither admit nor deny the same.

304. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304 and can neither admit nor deny the same.

305. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 305 and can neither admit nor deny the same.

306. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306 and can neither admit nor deny the same.

307. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307 and can neither admit nor deny the same.

308. Noramco denies the allegations in the final sentence of Paragraph 308. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308 and can neither admit nor deny the same.

309. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 309 and can neither admit nor deny the same.

310. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 310 and can neither admit nor deny the same.

311. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 311 and can neither admit nor deny the same.

312. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312, including all subparagraphs, and can neither admit nor deny the same.

313. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313 and can neither admit nor deny the same.

314. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314 and can neither admit nor deny the same.

315. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315 and can neither admit nor deny the same.

316. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 316 and can neither admit nor deny the same.

317. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 317 and can neither admit nor deny the same.

318. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 318 and can neither admit nor deny the same.

319. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 319 and can neither admit nor deny the same.

320. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 320 and can neither admit nor deny the same.

321. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321 and can neither admit nor deny the same.

322. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 322 and can neither admit nor deny the same.

323. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 323 and can neither admit nor deny the same.

324. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 324 and can neither admit nor deny the same.

325. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 325 and can neither admit nor deny the same.

326. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326 and can neither admit nor deny the same.

327. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327 and can neither admit nor deny the same.

328. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 328 and can neither admit nor deny the same.

329. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 329 and can neither admit nor deny the same.

330. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330 and can neither admit nor deny the same.

331. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 331 and can neither admit nor deny the same.

332. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 332 and can neither admit nor deny the same.

333. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333 and can neither admit nor deny the same.

334. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334 and can neither admit nor deny the same.

335. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 335 and can neither admit nor deny the same.

336. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 336 and can neither admit nor deny the same.

337. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 337 and can neither admit nor deny the same.

338. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 338 and can neither admit nor deny the same.

339. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 339 and can neither admit nor deny the same.

340. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 340 and can neither admit nor deny the same.

341. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 341 and can neither admit nor deny the same.

342. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 342 and can neither admit nor deny the same.

343. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343 and can neither admit nor deny the same.

344. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344 and can neither admit nor deny the same.

345. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345 and can neither admit nor deny the same.

346. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 346 and can neither admit nor deny the same.

347. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347 and can neither admit nor deny the same.

348. Denied.

349. Denied.

350. Denied.

351. Denied.

352. Noramco denies the allegations in the second sentence of Paragraph 352, in which Plaintiffs allege: “Marketing Defendants exerted influence and effective control over the messaging by these groups by providing major funding directly to them, as well as through KOLs who served on their boards.” Noramco further denies the allegations in the fourth sentence of

Paragraph 352, in which Plaintiffs allege: “Defendants funded these Front Groups in order to ensure supportive messages from these seemingly neutral and credible third parties, and their funding did, in fact, ensure such supportive messages—often at the expense of their own constituencies.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352 and can neither admit nor deny the same.

353. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 353 and can neither admit nor deny the same.

354. Denied.

355. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355 and can neither admit nor deny the same.

356. Denied.

357. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357 and can neither admit nor deny the same.

358. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 358 and can neither admit nor deny the same.

359. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 359 and can neither admit nor deny the same.

360. Noramco denies the allegations in the first two sentences of Paragraph 360, in which Plaintiffs allege: “APF was often called upon to provide ‘patient representatives’ for the Marketing Defendants’ promotional activities, including for Purdue’s ‘Partners Against Pain’ and Janssen’s ‘Let’s Talk Pain.’ Although APF presented itself as a patient advocacy organization, it

functioned largely as an advocate for the interests of the Marketing Defendants, not patients.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 360 and can neither admit nor deny the same.

361. Denied.

362. Noramco denies the allegations in the first sentence of Paragraph 362, in which Plaintiffs allege: “This alignment of interests was expressed most forcefully in the fact that Purdue hired APF to provide consulting services on its marketing initiatives. Purdue and APF entered into a ‘Master Consulting Services’ Agreement on September 14, 2011.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362 and can neither admit nor deny the same.

363. Noramco denies the allegations in the first and second sentences of Paragraph 363, in which Plaintiffs allege: “APF’s Board of Directors was largely comprised of doctors who were on the Marketing Defendants’ payrolls, either as consultants or speakers at medical events. The close relationship between APF and the Marketing Defendants demonstrates APF’s clear lack of independence, in its finances, management, and mission, and its willingness to allow Marketing Defendants to control its activities and messages supports an inference that each Defendant that worked with it was able to exercise editorial control over its publications—even when Defendants’ messages contradicted APF’s internal conclusions.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 363 and can neither admit nor deny the same.

364. Noramco denies the allegations in the final sentence of Paragraph 364, in which Plaintiffs allege: “Without support from Marketing Defendants, to whom APF could no longer be

helpful, APF was no longer financially viable.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 364 and can neither admit nor deny the same.

365. Noramco denies the allegations in the first sentence of Paragraph 365, in which Plaintiffs allege: “The American Academy of Pain Medicine (‘AAPM’) and the American Pain Society (‘APS’) are professional medical societies, each of which received substantial funding from Defendants from 2009 to 2013.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 365 and can neither admit nor deny the same.

366. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 366 and can neither admit nor deny the same.

367. Noramco specifically denies that Dr. Scott Fishman served as a key opinion leader, or “KOL,” for Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 367 and can neither admit nor deny the same.

368. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 368 and can neither admit nor deny the same.

369. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 369 and can neither admit nor deny the same.

370. Denied.

371. Noramco denies the second sentence of Paragraph 371, in which Plaintiffs allege: “AAPM, with the assistance, prompting, involvement, and funding of Defendants, issued the

treatment guidelines discussed herein, and continued to recommend the use of opioids to treat chronic pain.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 371 and can neither admit nor deny the same.

372. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 372 and can neither admit nor deny the same.

373. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 373 and can neither admit nor deny the same.

374. Answering the allegations in the final sentence of Paragraph 374, in which Plaintiffs allege, “For that reason, the CDC has recognized that treatment guidelines can ‘change prescribing practices,’” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 374.

375. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 375 and can neither admit nor deny the same.

376. Noramco denies the allegations in the first sentence of Paragraph 376, in which Plaintiffs allege: “The Marketing Defendants widely cited and promoted the 2009 Guidelines without disclosing the lack of evidence to support their conclusions, their involvement in the development of the Guidelines or their financial backing of the authors of these Guidelines.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 376 and can neither admit nor deny the same.

377. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 377 and can neither admit nor deny the same.

378. Denied.

379. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 379 and can neither admit nor deny the same.

380. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 380 and can neither admit nor deny the same.

381. Noramco denies the allegations in the first sentence of Paragraph 381, in which Plaintiffs allege: “FSMB’s 2007 publication Responsible Opioid Prescribing was backed largely by drug manufacturers, including Purdue, Endo and Cephalon.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 381 and can neither admit nor deny the same.

382. Noramco denies the allegations in the first sentence of Paragraph 382, in which Plaintiffs allege: “The Marketing Defendants relied on the 1998 Guidelines to convey the alarming message that ‘under-treatment of pain’ would result in official discipline, but no discipline would result if opioids were prescribed as part of an ongoing patient relationship and prescription decisions were documented.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 382 and can neither admit nor deny the same.

383. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383 and can neither admit nor deny the same.

384. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384 and can neither admit nor deny the same.

385. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 385 and can neither admit nor deny the same.

386. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386 and can neither admit nor deny the same.

387. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 387 and can neither admit nor deny the same.

388. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 388 and can neither admit nor deny the same.

389. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389 and can neither admit nor deny the same.

390. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390 and can neither admit nor deny the same.

391. Answering the allegations in the final sentence of Paragraph 391, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegation and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 391.

392. Answering the third and fourth sentences of Paragraph 392, in which Plaintiffs allege, “AGS contracted with Purdue, Endo and Janssen to disseminate guidelines regarding the use of opioids for chronic pain in 2002 (The Management of Persistent Pain in Older Persons, hereinafter ‘2002 AGS Guidelines’) and 2009 (Pharmacological Management of Persistent Pain

in Older Persons, hereinafter ‘2009 AGS Guidelines’). According to news reports, AGS has received at least \$344,000 in funding from opioid manufacturers since 2009,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 392.

393. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 393 and can neither admit nor deny the same.

394. Noramco denies the allegations in the first sentence of Paragraph 394. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 394 and can neither admit nor deny the same.

395. Noramco denies the allegations in the first sentence of Paragraph 395. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395 and can neither admit nor deny the same.

396. Denied.

397. Denied.

398. Denied.

399. Denied.

400. Noramco denies the allegations in the first sentence of Paragraph 400, in which Plaintiffs allege: “In return for their pro-opioid advocacy, the Marketing Defendants’ KOLs received money, prestige, recognition, research funding, and avenues to publish.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 400 and can neither admit nor deny the same.

401. Denied.

402. Denied.

403. Denied.

404. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 404 and can neither admit nor deny the same.

405. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 405 and can neither admit nor deny the same.

406. Noramco denies the allegations in the first sentence of Paragraph 406. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 406 and can neither admit nor deny the same.

407. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 407 and can neither admit nor deny the same.

408. Noramco denies the allegations in the first sentence of Paragraph 408. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 408 and can neither admit nor deny the same.

409. Noramco denies the allegations in the first sentence of Paragraph 409. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 409 and can neither admit nor deny the same.

410. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 410 and can neither admit nor deny the same.

411. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 411 and can neither admit nor deny the same.

412. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 412 and can neither admit nor deny the same.

413. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 413 and can neither admit nor deny the same.

414. Noramco denies the allegations in the final sentence of Paragraph 414, in which Plaintiffs allege: “In keeping with the Marketing Defendants’ promotional messages, Dr. Webster apparently believed the solution to patients’ tolerance or addictive behaviors was more opioids: he prescribed staggering quantities of pills.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 414 and can neither admit nor deny the same.

415. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 415 and can neither admit nor deny the same.

416. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 416 and can neither admit nor deny the same.

417. Noramco denies the allegations in the first sentence of Paragraph 417, in which Plaintiffs allege: “Dr. Perry Fine’s ties to the Marketing Defendants are well documented.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 417 and can neither admit nor deny the same.

418. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 418 and can neither admit nor deny the same.

419. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419 and can neither admit nor deny the same.

420. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 420 and can neither admit nor deny the same.

421. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 421 and can neither admit nor deny the same.

422. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 422 and can neither admit nor deny the same.

423. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 423 and can neither admit nor deny the same.

424. Noramco denies the allegations in the third sentence of Paragraph 424, in which Plaintiffs allege: “As discussed below, he has authored publications, including the seminal guides on opioid prescribing, which were funded by the Marketing Defendants.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 424 and can neither admit nor deny the same.

425. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 425 and can neither admit nor deny the same.

426. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426 and can neither admit nor deny the same.

427. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 427 and can neither admit nor deny the same.

428. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 428 and can neither admit nor deny the same.

429. Denied.

430. Denied.

431. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431 and can neither admit nor deny the same.

432. Noramco denies the allegations in the final sentence of Paragraph 432, in which Plaintiffs allege: “As one target, Defendants aimed to reach general practitioners, whose broad area of practice and lack of expertise and specialized training in pain management made them particularly dependent upon CMEs and, as a result, especially susceptible to the Marketing Defendants’ deceptions.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 432 and can neither admit nor deny the same.

433. Denied.

434. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 434 and can neither admit nor deny the same.

435. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 435 and can neither admit nor deny the same.

436. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 436 and can neither admit nor deny the same.

437. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 437 and can neither admit nor deny the same.

438. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438 and can neither admit nor deny the same.

439. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 439 and can neither admit nor deny the same.

440. Denied.

441. Denied.

442. Answering the allegations in the final sentence of Paragraph 442, in which Plaintiffs allege, “The 2011 total includes \$8.3 million by Purdue, \$4.9 million by Janssen, and \$1.1 million by Endo,” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 442.

443. Answering the allegations in the fourth sentence of Paragraph 443, in which Plaintiffs allege, “Endo’s research, for example, also found that such communications resulted in greater patient ‘brand loyalty,’ with longer durations of Opana ER therapy and fewer discontinuations,” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 443.

444. Noramco denies the allegations in the first sentence of Paragraph 444, in which Plaintiffs allege: “The Marketing Defendants also aggressively promoted opioids through ‘unbranded advertising’ to generally tout the benefits of opioids without specifically naming a particular brand-name opioid drug.” Noramco further denies the allegations in the final sentence of Paragraph 444, in which Plaintiffs allege: “Through unbranded materials, the Marketing Defendants expanded the overall acceptance of and demand for chronic opioid therapy without the restrictions imposed by regulations on branded advertising.” Except as thus stated, Noramco is

without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 444 and can neither admit nor deny the same.

445. Noramco denies the allegations in the first sentence of Paragraph 445. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445 and can neither admit nor deny the same.

446. Denied.

447. Denied.

448. Denied.

449. Denied.

450. Denied.

451. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451 and can neither admit nor deny the same.

452. Denied.

453. Denied.

454. Denied.

455. Answering the allegations in the final sentence of Paragraph 455, in which Plaintiffs allege, “The amount includes \$108 million spent by Purdue, \$34 million by Janssen, \$13 million by Teva, and \$10 million by Endo,” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 455.

456. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456 and can neither admit nor deny the same.

457. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457 and can neither admit nor deny the same.

458. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458 and can neither admit nor deny the same.

459. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 459 and can neither admit nor deny the same.

460. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460 and can neither admit nor deny the same.

461. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461 and can neither admit nor deny the same.

462. Answering the allegations in the final sentence of Paragraph 462, in which Plaintiffs allege, “Purdue, Janssen, Endo, Cephalon, and Mallinckrodt each made thousands of payments to physicians nationwide, for activities including participating on speakers’ bureaus, providing consulting services, and other services,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 462.

463. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463 and can neither admit nor deny the same.

464. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464 and can neither admit nor deny the same.

465. Denied.

466. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 466 and can neither admit nor deny the same.

467. Noramco denies the allegations in the first sentence of Paragraph 467. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 467 and can neither admit nor deny the same.

468. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 468 and can neither admit nor deny the same.

469. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 469 and can neither admit nor deny the same.

470. Noramco denies the allegations in the first sentence of Paragraph 470. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 470 and can neither admit nor deny the same.

471. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 471 and can neither admit nor deny the same.

472. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 472 and can neither admit nor deny the same.

473. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 473 and can neither admit nor deny the same.

474. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 474 and can neither admit nor deny the same.

475. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 475 and can neither admit nor deny the same.

476. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 476 and can neither admit nor deny the same.

477. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 477 and can neither admit nor deny the same.

478. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 478 and can neither admit nor deny the same.

479. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 479 and can neither admit nor deny the same.

480. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 480 and can neither admit nor deny the same.

481. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 481 and can neither admit nor deny the same.

482. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 482 and can neither admit nor deny the same.

483. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 483 and can neither admit nor deny the same.

484. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 484 and can neither admit nor deny the same.

485. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 485 and can neither admit nor deny the same.

486. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 486 and can neither admit nor deny the same.

487. Omitted from the Complaint.

488. Denied.

489. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 489 and can neither admit nor deny the same.

490. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 490 and can neither admit nor deny the same.

491. Denied.

492. Noramco denies the allegations in the first sentence of Paragraph 492. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 492 and can neither admit nor deny the same.

493. Noramco denies the allegations in the first sentence of Paragraph 493, in which Plaintiffs allege: “Marketing Defendants spent millions of dollars to market their drugs to prescribers and patients and meticulously tracked their return on that investment.” Noramco further denies the allegations in the final sentence of Paragraph 493, in which Plaintiffs allege: “These results are directly due to the Marketing Defendants’ fraudulent marketing campaign focused on several misrepresentations.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 493 and can neither admit nor deny the same.

494. Denied.

495. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 495 and can neither admit nor deny the same.

496. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 496 and can neither admit nor deny the same.

497. Omitted from the Complaint.

498. Denied.

499. Noramco denies the first sentence of Paragraph 499, in which Plaintiffs allege: “For over a decade, as the Marketing Defendants increased the demand for opioids, all the Defendants aggressively sought to bolster their revenue, increase profit, and grow their share of the prescription painkiller market by unlawfully and surreptitiously increasing the volume of opioids they sold.” Except as thus stated, as to the remaining allegations in Paragraph 499, those allegations call for a legal conclusion to which no response is required.

500. The allegations in Paragraph 500 call for a legal conclusion to which no response is required.

487. [sic] As to improperly numbered paragraph 487, on page 149 of the Complaint, Noramco denies the allegations in the first and second sentences of that Paragraph, in which Plaintiffs allege: “Marketing Defendants’ scheme was resoundingly successful. Chronic opioid therapy—the prescribing of opioids long-term to treat chronic pain—has become a commonplace, and often first-line, treatment. Marketing Defendants’ deceptive marketing caused prescribing not only of their opioids, but of opioids as a class, to skyrocket.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in improperly numbered Paragraph 487, on Page 149 of the Complaint, and can neither admit nor deny the same.

497. [sic] As to improperly numbered Paragraph 497, on page 149 of the Complaint, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in improperly numbered Paragraph 497 and can neither admit nor deny the same.

501. The allegations in Paragraph 501 call for a legal conclusion to which no response is required.

502. Answering the first sentence in Paragraph 502, the allegations in that sentence call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 502.

503. The allegations in Paragraph 503 call for a legal conclusion to which no response is required.

504. Noramco denies the final sentence of Paragraph 504. Except as thus stated, the allegations in Paragraph 504 call for a legal conclusion to which no response is required.

505. The allegations in Paragraph 505 call for a legal conclusion to which no response is required.

506. Answering the allegations in first sentence of Paragraph 506, Noramco responds that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Answering the second sentence of Paragraph 506, Noramco admits the allegations in that sentence only. Answering the third, fourth, and fifth sentences of Paragraph 506, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Answering the sixth sentence of Paragraph 506, Noramco states that the allegations in that sentence

call for a legal conclusion to which no response is required. Noramco denies the allegations in the seventh and eighth sentences of Paragraph 506.

507. The allegations in Paragraph 507 call for a legal conclusion to which no response is required.

508. Noramco admits only the allegations in the first sentence of Paragraph 508, in which Plaintiffs allege: “Central to the closed-system created by the CSA was the directive that the DEA determine quotas of each basic class of Schedule I and II controlled substances each year.” Except as thus stated, as to the remaining allegations in Paragraph 508, including all subparagraphs, Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same.

509. The allegations in Paragraph 509 call for a legal conclusion to which no response is required.

510. The allegations in Paragraph 510 call for a legal conclusion to which no response is required.

511. Answering the allegations in the final sentence in Paragraph 511, in which Plaintiffs allege, “For this reason, identification of suspicious orders serves also to identify excessive volume of the controlled substance being shipped to a particular region,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, the remaining allegations in Paragraph 511 call for a legal conclusion to which no response is required.

512. The allegations in Paragraph 512 call for a legal conclusion to which no response is required.

513. The allegations in Paragraph 513 call for a legal conclusion to which no response is required.

514. The allegations in Paragraph 514 call for a legal conclusion to which no response is required.

515. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 515 and can neither admit nor deny the same.

516. Denied.

517. The allegations in Paragraph 517 call for a legal conclusion to which no response is required.

518. Denied.

519. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 519 and can neither admit nor deny the same.

520. Denied.

521. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 521 and can neither admit nor deny the same.

522. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 522 and can neither admit nor deny the same.

523. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 523 and can neither admit nor deny the same.

524. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 524 and can neither admit nor deny the same.

525. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 525 and can neither admit nor deny the same.

526. Denied.

527. Noramco denies the allegations in the first and second sentences of Paragraph 527, in which Plaintiffs allege: “Wholesale distributors such as the Distributor Defendants had close financial relationships with both Marketing Defendants and customers, for whom they provide a broad range of value added services that render them uniquely positioned to obtain information and control against diversion. These services often otherwise would not be provided by manufacturers to their dispensing customers and would be difficult and costly for the dispenser to reproduce.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 527 and can neither admit nor deny the same.

528. Denied.

529. Noramco denies the allegations in the first sentence of Paragraph 529, in which Plaintiffs allege: “The Marketing Defendants engaged in the practice of paying rebates and/or chargebacks to the Distributor Defendants for sales of prescription opioids as a way to help them boost sales and better target their marketing efforts.” Noramco further denies the allegations in the final two sentences of Paragraph 529, in which Plaintiffs allege: “Marketing Defendants buy data from pharmacies as well. This exchange of information, upon information, and belief, would have opened channels providing for the exchange of information revealing suspicious orders as well.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 529 and can neither admit nor deny the same.

530. Answering the second sentence of Paragraph 530, in which Plaintiffs allege, “Defendants are required to maintain certain security protocols and storage facilities for the manufacture and distribution of their opioids,” Noramco states that these allegations call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 530.

531. Denied.

532. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 532 and can neither admit nor deny the same.

533. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 533 and can neither admit nor deny the same.

534. Noramco denies the allegations in the third and fourth sentences of Paragraph 534, in which Plaintiffs allege: “Each of the Marketing Defendants worked together through the PCF. But the Marketing Defendants were not alone.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 534 and can neither admit nor deny the same.

535. Answering the allegations in the second sentence of Paragraph 535, in which Plaintiffs allege, “Although the entire HDA membership directory is private, the HDA website confirms that each of the Distributor Defendants and several of the Marketing Defendants, including Actavis, Endo, Purdue, Mallinckrodt, and Cephalon, were members of the HAD,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, denied.

536. Denied.

537. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 537 and can neither admit nor deny the same.

538. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 538 and can neither admit nor deny the same.

539. Denied.

540. Answering the first sentence of Paragraph 540, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 540.

541. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 541, including all subparagraphs, and can neither admit nor deny the same.

542. Answering the allegations in the second sentence of Paragraph 542, in which Plaintiffs allege, “For example, on April 27, 2011, the HDA offered a Webinar to ‘accurately and effectively exchange business transactions between distributors and manufacturers,’” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 542.

543. Denied.

544. Denied.

545. Noramco denies the allegations in the first sentence of Paragraph 545. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 545 and can neither admit nor deny the same.

546. Answering the allegations in the second sentence of Paragraph 546, in which Plaintiffs allege, “As John M. Gray, President/CEO of the HDA stated to the Energy and Commerce Subcommittee on Health in April 2014, is ‘difficult to find the right balance between proactive anti-diversion efforts while not inadvertently limiting access to appropriately prescribed and dispensed medications,’” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 546.

547. Omitted from the Complaint.

548. Denied.

549. Denied.

550. Denied.

551. The allegations in the first sentence of Paragraph 551 call for a legal conclusion to which no response is required. Except as thus stated, denied.

552. Denied.

553. Denied.

554. Denied.

555. Denied.

556. Denied, including all subparagraphs.

557. Denied.

558. Denied.

559. Answering the allegations in the first and second sentences of Paragraph 559, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 559.

560. Denied.

561. Denied.

562. Denied.

563. Noramco denies the allegations in the first sentence of Paragraph 563. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 563 and can neither admit nor deny the same.

564. Omitted from the Complaint.

565. Denied.

566. Answering the allegations in the final sentence of Paragraph 566, in which Plaintiffs allege, “These numbers include seventy-six (76) actions involving orders to show cause and forty-one (41) actions involving immediate suspension orders, all for failure to report suspicious orders,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 566.

567. Noramco denies the allegations in the first sentence of Paragraph 567. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567 and can neither admit nor deny the same.

568. Noramco denies the allegations in the first sentence of Paragraph 568. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568 and can neither admit nor deny the same.

569. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569 and can neither admit nor deny the same.

570. Denied.

571. Denied.

572. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 572 and can neither admit nor deny the same.

573. Noramco denies the allegations in the first sentence of Paragraph 573. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 573 and can neither admit nor deny the same.

574. Denied.

575. Noramco denies the allegations in the first sentence of Paragraph 575. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 575 and can neither admit nor deny the same.

576. Noramco denies the allegations in the first sentence of Paragraph 576. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 576 and can neither admit nor deny the same.

577. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577 and can neither admit nor deny the same.

578. Denied.

579. Denied.

580. Denied.

581. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 581 and can neither admit nor deny the same.

582. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 582 and can neither admit nor deny the same.

583. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 583 and can neither admit nor deny the same.

584. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584, including all subparagraphs, and can neither admit nor deny the same.

585. Noramco denies the allegations in the fourth sentence of Paragraph 585, in which Plaintiffs allege: “These quantities alone are sufficient to show that the Defendants failed to control the supply chain or to report and take steps to halt suspicious orders.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 585 and can neither admit nor deny the same.

586. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586 and can neither admit nor deny the same.

587. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587 and can neither admit nor deny the same.

588. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588 and can neither admit nor deny the same.

589. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 589 and can neither admit nor deny the same.

590. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 590 and can neither admit nor deny the same.

591. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 591 and can neither admit nor deny the same.

592. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592 and can neither admit nor deny the same.

593. Denied.

594. Denied.

595. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 595 and can neither admit nor deny the same.

596. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 596 and can neither admit nor deny the same.

597. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597 and can neither admit nor deny the same.

598. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598 and can neither admit nor deny the same.

599. Denied, including all subparagraphs.

600. Denied.

601. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601 and can neither admit nor deny the same.

602. Noramco denies the allegations in the first sentence of Paragraph 602. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602 and can neither admit nor deny the same.

603. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603 and can neither admit nor deny the same.

604. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604 and can neither admit nor deny the same.

605. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605 and can neither admit nor deny the same.

606. Denied.

607. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 607 and can neither admit nor deny the same.

608. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608 and can neither admit nor deny the same.

609. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609 and can neither admit nor deny the same.

610. Noramco denies the allegations in the fourth sentence of Paragraph 610, in which Plaintiffs allege: “On information and belief, the National Retail Pharmacies also provided Defendants with data regarding, inter alia, individual doctors in exchange for rebates or other forms of consideration.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610 and can neither admit nor deny the same.

611. The allegations in Paragraph 611 call for a legal conclusion to which no response is required.

612. The allegations in Paragraph 612 call for a legal conclusion to which no response is required.

613. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 613 and can neither admit nor deny the same.

614. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614 and can neither admit nor deny the same.

615. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 615 and can neither admit nor deny the same.

616. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 616 and can neither admit nor deny the same.

617. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617 and can neither admit nor deny the same.

618. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618 and can neither admit nor deny the same.

619. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619 and can neither admit nor deny the same.

620. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620 and can neither admit nor deny the same.

621. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621 and can neither admit nor deny the same.

622. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622 and can neither admit nor deny the same.

623. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623 and can neither admit nor deny the same.

624. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624 and can neither admit nor deny the same.

625. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625 and can neither admit nor deny the same.

626. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626 and can neither admit nor deny the same.

627. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627 and can neither admit nor deny the same.

628. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 628 and can neither admit nor deny the same.

629. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629 and can neither admit nor deny the same.

630. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630 and can neither admit nor deny the same.

631. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631 and can neither admit nor deny the same.

632. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632 and can neither admit nor deny the same.

633. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633 and can neither admit nor deny the same.

634. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634 and can neither admit nor deny the same.

635. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635 and can neither admit nor deny the same.

636. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636 and can neither admit nor deny the same.

637. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637 and can neither admit nor deny the same.

638. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638 and can neither admit nor deny the same.

639. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639 and can neither admit nor deny the same.

640. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640 and can neither admit nor deny the same.

641. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641 and can neither admit nor deny the same.

642. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642 and can neither admit nor deny the same.

643. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643 and can neither admit nor deny the same.

644. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644 and can neither admit nor deny the same.

645. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645 and can neither admit nor deny the same.

646. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646 and can neither admit nor deny the same.

647. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647 and can neither admit nor deny the same.

648. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 648 and can neither admit nor deny the same.

649. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649 and can neither admit nor deny the same.

650. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650 and can neither admit nor deny the same.

651. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 651 and can neither admit nor deny the same.

652. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 652 and can neither admit nor deny the same.

653. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 653 and can neither admit nor deny the same.

654. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 654 and can neither admit nor deny the same.

655. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 655 and can neither admit nor deny the same.

656. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 656 and can neither admit nor deny the same.

657. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657 and can neither admit nor deny the same.

658. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 658 and can neither admit nor deny the same.

659. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 659 and can neither admit nor deny the same.

660. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 660 and can neither admit nor deny the same.

661. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 661 and can neither admit nor deny the same.

662. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 662 and can neither admit nor deny the same.

663. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 663 and can neither admit nor deny the same.

664. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 664 and can neither admit nor deny the same.

665. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 665 and can neither admit nor deny the same.

666. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 666 and can neither admit nor deny the same.

667. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 667 and can neither admit nor deny the same.

668. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 668 and can neither admit nor deny the same.

669. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 669 and can neither admit nor deny the same.

670. Noramco denies the allegations in the final sentence of Paragraph 670. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 670 and can neither admit nor deny the same.

671. Denied.

672. Denied.

673. Noramco denies the allegations in the first sentence of Paragraph 673, in which Plaintiffs allege: “Not surprisingly, sales representatives from each of the Marketing Defendants visited prescribers in Summit County.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 673 and can neither admit nor deny the same.

674. Noramco denies the allegations in the first and second sentences of Paragraph 674, in which Plaintiffs allege: “Marketing Defendants succeeded. Each of Defendants’ drugs and/or their generic equivalents have been prescribed in Summit County.” Noramco further denies the allegations in the fourth sentence of Paragraph 674, in which Plaintiffs allege: “As one would

expect, given Marketing Defendants targeting of family medicine doctors, these practitioners were consistently among the top prescribers of opioids paid for by the City of Akron.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 674 and can neither admit nor deny the same.

675. Noramco denies the allegations in the first sentence of Paragraph 675. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 675 and can neither admit nor deny the same.

676. Denied.

677. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 677 and can neither admit nor deny the same.

678. Denied.

679. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679 and can neither admit nor deny the same.

680. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 680 and can neither admit nor deny the same.

681. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681 and can neither admit nor deny the same.

682. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 682 and can neither admit nor deny the same.

683. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683 and can neither admit nor deny the same.

684. The allegations in Paragraph 684 call for a legal conclusion to which no response is required.

685. The allegations in Paragraph 685 call for a legal conclusion to which no response is required.

686. The allegations in Paragraph 686 call for a legal conclusion to which no response is required.

687. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687 and can neither admit nor deny the same.

688. Denied.

689. Noramco denies the allegations in the first sentence of Paragraph 689. Noramco also denies the allegations in the final sentence of Paragraph 689. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689 and can neither admit nor deny the same.

690. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 690 and can neither admit nor deny the same.

691. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 691 and can neither admit nor deny the same.

692. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 692 and can neither admit nor deny the same.

693. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 693 and can neither admit nor deny the same.

694. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 694 and can neither admit nor deny the same.

695. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695 and can neither admit nor deny the same.

696. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 696 and can neither admit nor deny the same.

697. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 697 and can neither admit nor deny the same.

698. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 698 and can neither admit nor deny the same.

699. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 699 and can neither admit nor deny the same.

700. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 700 and can neither admit nor deny the same.

701. Denied.

702. Noramco denies the allegations in subparagraphs (a), (b), (c), and (g) of Paragraph 702. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 702, specifically, subparagraphs (d), (e), and (f), and can neither admit nor deny the same.

703. Omitted from the Complaint.

704. Omitted from the Complaint.

705. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 705 and can neither admit nor deny the same.

706. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 706 and can neither admit nor deny the same.

707. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 707 and can neither admit nor deny the same.

708. Denied.

709. Noramco denies the allegations in the final sentence of Paragraph 709. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 709 and can neither admit nor deny the same.

710. Noramco denies the allegation in the first sentence of Paragraph 710. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 710 and can neither admit nor deny the same.

711. Omitted from the Complaint.

712. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 712 and can neither admit nor deny the same.

713. Denied.

714. Denied.

715. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 715 and can neither admit nor deny the same.

716. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 716 and can neither admit nor deny the same.

717. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 717 and can neither admit nor deny the same.

718. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 718 and can neither admit nor deny the same.

719. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 719 and can neither admit nor deny the same.

720. Denied.

721. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 721 and can neither admit nor deny the same.

722. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 722 and can neither admit nor deny the same.

723. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 723 and can neither admit nor deny the same.

724. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 724 and can neither admit nor deny the same.

725. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 725 and can neither admit nor deny the same.

726. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 726 and can neither admit nor deny the same.

727. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 727 and can neither admit nor deny the same.

728. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 728 and can neither admit nor deny the same.

729. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 729 and can neither admit nor deny the same.

730. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 730 and can neither admit nor deny the same.

731. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 731 and can neither admit nor deny the same.

732. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 732 and can neither admit nor deny the same.

733. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 733 and can neither admit nor deny the same.

734. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 734 and can neither admit nor deny the same.

735. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 735 and can neither admit nor deny the same.

736. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 736 and can neither admit nor deny the same.

737. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 737 and can neither admit nor deny the same.

738. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 738 and can neither admit nor deny the same.

739. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 739 and can neither admit nor deny the same.

740. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 740 and can neither admit nor deny the same.

741. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 741 and can neither admit nor deny the same.

742. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 742 and can neither admit nor deny the same.

743. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 743 and can neither admit nor deny the same.

744. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 744 and can neither admit nor deny the same.

745. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 745 and can neither admit nor deny the same.

746. Denied.

747. Denied.

748. Denied.

749. Denied.

750. Denied.

751. Denied.

752. Denied.

753. Denied.

754. Noramco denies the allegations in the first sentence of Paragraph 754. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 754 and can neither admit nor deny the same.

755. Denied.

756. Noramco denies the allegations in the first sentence of Paragraph 756. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 756 and can neither admit nor deny the same.

757. Denied.

758. Denied.

759. Denied.

760. Denied.

761. Denied.

762. Denied.

763. Denied.

764. Denied.

765. Denied.

766. Denied.

767. Denied.

768. Denied.

769. The allegations in Paragraph 769 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco denies the allegations in Paragraph 769.

770. Denied.

771. Denied.

772. Denied.

773. Denied. In further response to the allegations in Paragraph 773, Noramco specifically denies that it engaged in any misconduct.

774. Denied.

775. Noramco admits only that the Court ordered the production of ARCOS data. Except as thus stated, Noramco denies the allegations in Paragraph 775.

776. Denied.

777. Denied.

778. Denied.

779. Denied.

780. Denied.

781. Denied.

782. Denied.

783. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 783 and can neither admit nor deny the same.

784. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 784 and can neither admit nor deny the same.

785. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 785 and can neither admit nor deny the same.

786. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 786 and can neither admit nor deny the same.

787. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 787 and can neither admit nor deny the same.

788. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 788 and can neither admit nor deny the same.

789. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 789 and can neither admit nor deny the same.

790. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 790 and can neither admit nor deny the same.

791. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 791 and can neither admit nor deny the same.

792. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 792 and can neither admit nor deny the same.

793. Denied.

794. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 794 and can neither admit nor deny the same.

795. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 795 and can neither admit nor deny the same.

796. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 796, including all subparagraphs, and can neither admit nor deny the same.

797. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 797 and can neither admit nor deny the same.

798. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 798 and can neither admit nor deny the same.

799. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 799 and can neither admit nor deny the same.

800. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 800 and can neither admit nor deny the same.

801. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 801 and can neither admit nor deny the same.

802. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 802, including all subparagraphs, and can neither admit nor deny the same.

803. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 803 and can neither admit nor deny the same.

804. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 804 and can neither admit nor deny the same.

805. Omitted from the Complaint.

806. Omitted from the Complaint.

807. Omitted from the Complaint.

808. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 808 and can neither admit nor deny the same.

809. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 809 and can neither admit nor deny the same.

810. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 810 and can neither admit nor deny the same.

811. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 811 and can neither admit nor deny the same.

812. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 812 and can neither admit nor deny the same.

813. Denied.

814. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

815. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

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FIRST CLAIM FOR RELIEF

Violation of RICO, 18 U.S.C. § 1961 et seq.—Opioid Marketing Enterprise (Against Purdue, Cephalon, Janssen, Endo, and Mallinckrodt (the “RICO Marketing Defendants”))

878. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

879. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

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SECOND CLAIM FOR RELIEF

Violation of RICO, 18 U.S.C. § 1961 et seq.—Opioid Supply Chain Enterprise (Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen—“RICO Supply Chain Defendants”)

906. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

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938. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

THIRD CLAIM FOR RELIEF

**Violation Of The Ohio Corrupt Practices Act
Ohio Revised Code §§ 2923.31, et seq.
(Against Purdue, Cephalon, Janssen, Endo, and Mallinckrodt (the “Opioid Marketing Enterprise”))**

939. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

940. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

941. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

942. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

943. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

944. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

945. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

946. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

947. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

948. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

949. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

FOURTH CLAIM FOR RELIEF

**Violation Of The Ohio Corrupt Practices Act
Ohio Revised Code §§ 2923.31, et seq.
Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis,
McKesson, Cardinal, and AmerisourceBergen)
(The “Opioid Supply Chain Enterprise”)**

950. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

951. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

952. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

953. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

954. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

955. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

956. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

957. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

958. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

959. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

960. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

961. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

962. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

963. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

964. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

965. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

966. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

967. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

968. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

969. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

970. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

971. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

972. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

973. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

FIFTH CLAIM FOR RELIEF

Statutory Public Nuisance (Against All Defendants)

974. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

975. Noramco admits that the Plaintiffs listed in Paragraph 975 purport to bring a public nuisance claim. Noramco specifically denies that any Plaintiffs are entitled to any relief from Noramco under this public nuisance claim or any other claim for relief in the Complaint. Except

as thus stated, the allegations in Paragraph 975 call for a legal conclusion to which no response is required.

976. Noramco admits that the Plaintiff listed in Paragraph 976 purports to bring a public nuisance claim as specified in this Paragraph. Noramco specifically denies that any Plaintiffs are entitled to any relief from Noramco under the claim described in Paragraph 976 or under any other claim for relief in the Complaint. Except as thus stated, Noramco denies the allegations in Paragraph 976.

977. Noramco admits that the Plaintiffs listed in Paragraph 977 purport to bring a public nuisance claim as described in this Paragraph. Noramco specifically denies that any Plaintiffs are entitled to relief from Noramco under the claim described in Paragraph 977 or under any other claim for relief in the Complaint. Except as thus stated, Noramco denies the allegations in Paragraph 977.

978. The allegations in Paragraph 978 call for a legal conclusion to which no response is required.

979. The allegations in Paragraph 979 call for a legal conclusion to which no response is required.

980. Denied.

981. The allegations in Paragraph 981 call for a legal conclusion to which no response is required.

982. Denied.

983. Denied.

984. Denied.

985. Denied, including all subparagraphs.

986. Denied.

987. Answering the first sentence in Paragraph 987, Noramco responds that the allegations in that sentence call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 987.

988. Denied.

989. Denied.

990. Denied.

991. Denied.

992. Denied.

993. Denied.

994. Denied.

995. Noramco admits only that Plaintiffs purport to seek the relief alleged in Paragraph 995. Noramco specifically denies that Plaintiffs are entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 995.

996. Noramco admits only that Plaintiffs purport to seek the relief alleged in Paragraph 996. Noramco specifically denies that Plaintiffs are entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 996.

SIXTH CLAIM FOR RELIEF

**Common Law Absolute Public Nuisance
(Against All Defendants)**

997. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

998. Denied.

999. The allegations in Paragraph 999 call for a legal conclusion to which no response is required.

1000. Denied.

1001. Denied.

1002. Denied.

1003. Denied.

1004. Denied.

1005. Denied, including all subparagraphs.

1006. Denied, including all subparagraphs.

1007. Denied.

1008. Denied.

1009. The allegations in Paragraph 1009 call for a legal conclusion to which no response is required.

1010. Denied.

1011. Denied, including all subparagraphs.

1012. Denied.

1013. Denied.

1014. Denied.

1015. Denied.

1016. Denied.

1017. Denied.

1018. Denied.

1019. Denied.

1020. Denied.

1021. Denied.

1022. Denied.

1023. Denied.

1024. Denied.

1025. Denied.

1026. Denied.

1027. Denied.

1028. Denied.

1029. Denied.

1030. Noramco admits only that Plaintiffs purport to bring this action seeking to abate a nuisance allegedly created by Defendants' actions or omissions. Noramco specifically denies that it engaged in any wrongful conduct. Noramco further denies that Plaintiffs are entitled to any relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1030.

1031. Denied.

1032. Denied.

1033. Denied.

1034. Denied.

1035. Denied.

1036. Denied.

1037. Noramco admits that Plaintiffs attempt to bring a common law tort claim for absolute public nuisance as described in Paragraph 1037. Noramco further admits that Plaintiffs allege they are not seeking certain damages as described in Paragraph 1037. Except as thus stated, Noramco denies the allegations in Paragraph 1037.

1038. Noramco admits only that Plaintiffs purport to seek the relief alleged in Paragraph 1038. Noramco specifically denies that Plaintiffs are entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1038.

SEVENTH CLAIM FOR RELIEF

Negligence (Against All Defendants)

1039. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1040. The allegations in Paragraph 1040 call for a legal conclusion to which no response is required.

1041. The allegations in Paragraph 1041 call for a legal conclusion to which no response is required.

1042. The allegations in Paragraph 1042 call for a legal conclusion to which no response is required.

1043. The allegations in Paragraph 1043 call for a legal conclusion to which no response is required.

1044. Denied.

1045. Denied, including all subparagraphs.

1046. Denied.

1047. Denied.

1048. Denied.

1049. Denied.

1050. Denied.

1051. Denied.

1052. Denied.

1053. Denied.

1054. Denied.

1055. Denied.

1056. Denied.

1057. Denied.

1058. Denied.

1059. Denied.

1060. Denied.

1061. Denied, including all subparagraphs.

1062. Denied.

1063. Denied.

1064. Denied.

1065. Denied.

1066. Denied.

1067. Denied.

1068. Denied.

1069. Denied.

1070. Denied.

1071. Noramco admits only that Plaintiffs purport to seek the relief alleged in Paragraph 1071. Noramco specifically denies that Plaintiffs are entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1071.

EIGHTH CLAIM FOR RELIEF

Common Law Fraud (Against the Marketing Defendants)

1072. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1073. Denied.

1074. Denied, including subparagraphs (a) through (w).

1075. Denied, including subparagraphs (a) through (m).

1076. Denied.

1077. Denied.

1078. Denied.

1079. Denied.

1080. Denied

1081. Denied.

1082. Denied.

1083. Denied.

1084. Denied.

1085. Denied.

1086. Denied.

1087. Denied.

1088. Denied.

1089. Noramco admits only that Plaintiffs purport to seek the relief alleged in Paragraph 1089. Noramco specifically denies that Plaintiffs are entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1089.

NINTH CLAIM FOR RELIEF

Injury Through Criminal Acts (R.C. 2307.60) (Against All Defendants)

1090. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1091. The allegations in Paragraph 1091 call for a legal conclusion to which no response is required.

1092. Denied.

1093. Denied.

1094. Denied.

1095. Answering the first sentence of Paragraph 1095, Noramco states that the allegations in that sentence call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 1095.

1096. Denied.

1097. Answering the first sentence of Paragraph 1097, Noramco states that the allegations in that sentence call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 1097.

1098. Denied.

1099. Denied.

1100. Denied.

1101. Denied.

1102. Noramco denies the allegations in final sentence of Paragraph 1102. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1102 and can neither admit nor deny the same.

1103. Denied.

1104. Denied.

1105. Denied.

1106. Denied.

1107. Noramco admits only that Plaintiffs purport to seek the relief alleged in Paragraph 1107. Noramco specifically denies that Plaintiffs are entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1107.

TENTH CLAIM FOR RELIEF

Unjust Enrichment (Against All Defendants)

1108. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1109. Denied.

1110. The allegations in Paragraph 1110 call for a legal conclusion to which no response is required.

1111. Denied.

1112. Denied.

1113. Denied.

1114. Denied.

1115. Denied.

1116. Denied.

1117. Denied.

1118. Denied.

1119. Denied.

1120. Denied.

1121. Noramco admits only that Plaintiffs purport to seek the relief alleged in Paragraph 1121. Noramco specifically denies that Plaintiffs are entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1121.

ELEVENTH CLAIM FOR RELIEF

Civil Conspiracy (Against All Defendants)

1122. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1123. Denied.

1124. Denied.

1125. Denied.

1126. Denied.

1127. Denied.

1128. Denied.

1129. Denied.

1130. Denied.

1131. Denied.

1132. Denied.

1133. Denied.

1134. Denied.

1135. Denied.

1136. Noramco admits only that Plaintiffs purport to seek the relief alleged in Paragraph 1136. Noramco specifically denies that Plaintiffs are entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1136.

1137. Noramco denies that Plaintiffs are entitled to any relief requested in the Prayer for Relief. Noramco further denies that Plaintiffs are entitled to any relief whatsoever from Noramco in connection with this action.

Noramco specifically denies any allegations in Plaintiffs' Complaint not specifically admitted to herein.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Complaint fails to allege sufficient facts to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred in whole or in part by the applicable statutes of limitations and/or repose.

THIRD AFFIRMATIVE DEFENSE

The United States Food and Drug Administration and/or the United States Drug Enforcement Administration have primary jurisdiction to accord the relief Plaintiffs seek, especially with respect to Plaintiffs' requests for injunctive relief in the form of corrective communication, actions, and programs; accordingly, the Court should defer this matter to those federal agencies.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are preempted, in whole or in part, by federal law, including the Federal Food, Drug, and Cosmetic Act (and related regulations) and the Controlled Substances Act (and related regulations). *See, e.g., Mutual Pharm. Co. v. Bartlett*, 570 U.S. 472 (2013); *Buckman Co. v. Pls.' Legal Comm.*, 531 U.S. 341 (2011); *Geier v. Am. Honda Co.*, 529 U.S. 861 (2000); *Yates v. Ortho-McNeil-Janssen Pharm., Inc.*, 808 F.3d 281 (6th Cir. 2015).

FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are abrogated, in whole or in part, by the Ohio Product Liability Act. *See, e.g., Ohio Rev. Code Ann. § 2307.71(B)*.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, or in whole or in part, by the doctrine of laches.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs waived their claims against Noramco by failing to file them during the many years when Plaintiffs knew or should have known about such claims.

EIGHTH AFFIRMATIVE DEFENSE

The imposition of injunctive relief and/or civil penalties would be inequitable.

NINTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by the doctrine of unclean hands.

TENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by estoppel.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by res judicata and collateral estoppel.

TWELFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by the learned intermediary and sophisticated user doctrines. *See, e.g.*, Ohio Rev. Code Ann. § 2307.76(C).

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by the component part supplier doctrine.

FOURTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by the knowledgeable user doctrine, under which Noramco has no duty to warn, and thus cannot be held liable for failing to warn, of risks and complications of which members of the relevant medical community knew or should have known.

FIFTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by informed consent.

SIXTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by the unforeseeable alteration, modification, or misuse by Plaintiffs or third parties of any products at issue.

SEVENTEENTH AFFIRMATIVE DEFENSE

Plaintiffs have failed to join one or more necessary and indispensable parties, including, without limitation, health care providers, prescribers, patients, manufacturers, distributors,

pharmacies, payors, government entities, and other third parties whom Plaintiffs allege engaged in the unauthorized or illicit prescription, dispensing, diversion, or use of prescription opioid products in Ohio.

EIGHTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are not properly joined with Plaintiffs' claims against the other defendants because the claims do not arise out of the same alleged actions or omissions by all defendants in the case.

NINETEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred because Noramco did not owe any legal duty to Plaintiffs, or if Noramco owed any such legal duty, Noramco did not breach that duty.

TWENTIETH AFFIRMATIVE DEFENSE

Plaintiffs' fraud claims against Noramco are barred because Plaintiffs fail to allege any material misrepresentation made by Noramco.

TWENTY-FIRST AFFIRMATIVE DEFENSE

Plaintiffs fail to plead any claim with the requisite specificity, including fraud.

TWENTY-SECOND AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred to the extent they rely on conduct by third parties over which Noramco had no control or authority.

TWENTY-THIRD AFFIRMATIVE DEFENSE

Any imposition of penalties or other relief against Noramco for third parties' conduct violates Noramco's due process rights under the United States Constitution and any applicable state Constitution.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco and/or requests for relief from Noramco are barred because Noramco's conduct was not the legal or proximate cause of Plaintiffs' alleged injuries or damages.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' injuries, if any, were the result of intervening or superseding events or conditions, including third-party conduct, which were not reasonably foreseeable and for which Noramco is not liable.

TWENTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, because the injuries they allege were the result of one or more criminal acts by third parties.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred or limited by the economic loss doctrine, municipal cost recovery rule, and free public services doctrine.

TWENTY-EIGHTH AFFIRMATIVE DEFENSE

In the unlikely event that Noramco is found liable to Plaintiffs, Noramco is entitled to a credit or offset for any and all sums that Plaintiffs have received, or may hereafter receive, by way of any and all settlements or judgments arising from Plaintiffs' claims.

TWENTY-NINTH AFFIRMATIVE DEFENSE

Any verdict or judgment that might be recovered by Plaintiffs must be reduced by those amounts that have already or will in the future, with reasonable certainty, indemnify or otherwise reimburse Plaintiffs from a collateral source for any part of any economic loss.

THIRTIETH AFFIRMATIVE DEFENSE

Because third parties over which Noramco has no supervision or control are responsible for at least 51 percent of any tortious conduct, Noramco is only severally liable, if at all, for economic and non-economic injuries or expenses. *See* Ohio Rev. Code Ann. § 2307.22; 2307.23(C).

THIRTY-FIRST AFFIRMATIVE DEFENSE

Any damages must be reduced by the proportion of Plaintiffs' culpable conduct that caused the damages. *See* Ohio Rev. Code Ann. § 2315.33.

THIRTY-SECOND AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by Plaintiffs' failure to mitigate any damages allegedly sustained.

THIRTY-THIRD AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, to the extent that they seek relief for Noramco conduct that was not actionable at the time it occurred.

THIRTY-FOURTH AFFIRMATIVE DEFENSE

Any damages or injury to Plaintiffs must be set off against the benefits to the Plaintiffs as a result of Noramco's lawful activity and the net benefits bar any claims against Noramco.

THIRTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' unjust enrichment claim against Noramco is barred because Plaintiffs do not allege that Noramco wrongfully obtained a benefit from Plaintiffs.

THIRTY-SIXTH AFFIRMATIVE DEFENSE

Any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, including Plaintiffs' use of private contingency-fee counsel in this action, violates Noramco's rights under the Due Process Clause of the United States Constitution.

THIRTY-SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, because the application of Ohio law to conduct in other states or countries would violate the Dormant Commerce Clause of the United States Constitution.

THIRTY-EIGHTH AFFIRMATIVE DEFENSE

Plaintiffs' request for civil monetary penalties is barred, in whole or in part, by the Excessive Fines Clause of the Eighth Amendment of the United States Constitution and Article 1, Section 9 of the Ohio Constitution.

THIRTY-NINTH AFFIRMATIVE DEFENSE

Plaintiffs' request for civil monetary penalties and punitive damages is barred, in whole or in part, by the Due Process Clause of the Fifth and Fourteenth Amendments to the United States Constitution and by equivalent provisions in any applicable state Constitution.

FORTIETH AFFIRMATIVE DEFENSE

Plaintiffs' request for punitive damages is barred because Noramco complied with the Federal Food, Drug, and Cosmetic Act, the Controlled Substances Act, and other relevant federal statutes in lawfully manufacturing its products. *See* Ohio Rev. Code Ann. § 2307.80(C)(1).

FORTY-FIRST AFFIRMATIVE DEFENSE

Punitive damages, if any, must be reduced to reflect any punitive damages awards in other cases involving the same acts or course of conduct. *See, e.g.*, Ohio Rev. Code Ann. § 2315.21(D)(5)(a).

FORTY-SECOND AFFIRMATIVE DEFENSE

Punitive damages, if any, may not exceed twice the amount of any compensatory damages that the Court awards to Plaintiffs from Noramco. *See, e.g.*, Ohio Rev. Code Ann. § 2315.21(D)(2)(a).

FORTY-THIRD AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred and/or reduced by assumption of risk, contributory or comparative negligence, contributory or comparative fault, and proportionate responsibility.

FORTY-FOURTH AFFIRMATIVE DEFENSE

The conduct at issue may solely be the result of an obligation imposed by law, and thus Noramco is entitled to complete indemnity, express or implied, by other parties.

FORTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco and any damages are barred or limited, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers by a municipality.

FORTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred for lack of standing; Plaintiffs have no *parens patriae* or other authority to bring the claims alleged.

FORTY-SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' alleged damages are too speculative and remote to serve as a legal basis for any recovery.

FORTY-EIGHTH AFFIRMATIVE DEFENSE

Plaintiffs are barred from recovering any attorneys' fees under any applicable provisions of law, including but not limited to Section 54(E) of the Ohio Rules of Civil Procedure.

FORTY-NINTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by Plaintiffs' failure to comply with the requirement that they identify each patient in whose claim(s) Plaintiffs have a subrogation interest.

FIFTIETH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred under the constitutional principles of separation of powers.

FIFTY-FIRST AFFIRMATIVE DEFENSE

The legal rules underlying Plaintiffs' claims against Noramco, including but not limited to the Ohio public nuisance standard and the Racketeering Influenced and Corrupt Organizations Act, are unconstitutionally vague. *See, e.g., F.C.C. v. Fox Television Stations, Inc.*, 567 U.S. 239 (2012).

FIFTY-SECOND AFFIRMATIVE DEFENSE

Any claim that Noramco failed to sufficiently warn consumers of risks associated with its products is barred on the grounds that such a risk was well-known and readily apparent to

prescribing physicians. *See, e.g.*, Ohio Rev. Code. Ann. § 2307.76(B); Restatement (Second) of Torts § 402A, Comment j.

FIFTY-THIRD AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, because Noramco used standards, methods, and techniques that conformed to the generally recognized state of the art at the time the products at issue were designed, manufactured, and distributed.

FIFTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by the unavoidable risk rule of the Restatement (Second) of Torts § 402A, Comment k.

FIFTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims against Noramco are barred, in whole or in part, by the derivative injury rule and the remoteness doctrine, which bar Plaintiffs from recovering any payments that Plaintiffs allegedly made on behalf of residents to reimburse any expenses for health care, pharmaceutical care, and other public services.

FIFTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' public nuisance claims are barred because the alleged public nuisances have impermissibly extraterritorial reach and because Plaintiffs do not allege that Noramco's actions resulted in an unreasonable interference with a right common to the general public.

FIFTY-SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' damages are subject to applicable statutory and common law regarding limitations of awards, caps on recovery, and setoffs. *See, e.g.*, Ohio Rev. Code Ann. § 2315.18(B).

FIFTY-EIGHTH AFFIRMATIVE DEFENSE

Plaintiffs have not sufficiently alleged a basis for personal jurisdiction over Noramco. While Plaintiffs allege generally that all Defendants engaged in certain actions supporting the exercise of personal jurisdiction, Plaintiffs do not allege: (1) that Noramco specifically engaged in any conduct that would support the exercise of personal jurisdiction over it under Ohio's long-arm statute or (2) that Noramco specifically has any forum contacts necessary to support the exercise of general jurisdiction or specific jurisdiction under the Due Process Clause of the United States Constitution.

FIFTY-NINTH AFFIRMATIVE DEFENSE

Noramco expressly reserves the right to assert additional separate defenses as to which it currently lacks sufficient knowledge or information in the event that discovery indicates that such defenses would be appropriate.

JURY TRIAL DEMAND

Noramco hereby demands a trial by jury on all issues so triable.

Dated: January 15, 2019

Respectfully submitted,

/s/ Jenny A. Hergenrother

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CERTIFICATE OF SERVICE

I hereby certify that on this date, a copy of the foregoing **Defendant Noramco, Inc.’s Answer to Plaintiffs’ Corrected Second Amended Complaint, Affirmative Defenses, and Jury Demand** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

Dated: January 15, 2019

/s/Jenny A. Hergenrother
Jenny A. Hergenrother